



279355

*Exhibit C*DECLARATION OF DOUG McDANIEL

I, Doug McDaniel, state the following:

1. I am a former employee of Walerko Tool & Engineering Corporation ("Walerko"). Except for an approximately nine-month period in 1986, I worked at Walerko from August 1978 to April 1989. I was originally hired as a tool and cutter grinder. In 1983, I earned a degree in computerized numerically controlled ("CNC") machinery from the Acme Institute of Technology. I completed a seven-year apprenticeship at Walerko as a CNC machinist.

2. While operating a CNC machine at Walerko, heavy cutting oil was pumped through the machine to wash out metal chips and to keep the machine cool. Once the machining process was completed, I cleaned the oil and metal dust off of the machined parts by dipping the parts into a solvent, which during the late 1970's and early 1980's, was either trichloroethylene ("TCE") or trichloroethane ("TCA"). A 10 gallon bucket of this solvent was kept next to each machine and was used to clean small parts. A larger steel container filled with the same solvent was used to clean larger parts.

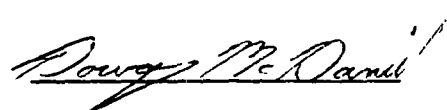
3. Approximately once a week, I disposed of used solvent (TCE or TCA) from the 10 gallon bucket into the alley behind the Walerko plant and then refilled the bucket with fresh solvent. Occasionally, when the larger steel container was dirty, I would dispose of the used contents from the 10 gallon bucket into the

larger steel container in the shop rather than emptying it outside of the plant.

4. At the time of my employment, Walerko stored chemicals including solvents and cutting oils across the street from the shop, one block east of Lusher Street. On several occasions, I detected spills of cutting oil in that building because the floors were slippery and an oily odor was present.

5. In late Summer 1987, a co-worker posted sample results of Walerko's drinking water, which indicated that the water was contaminated. In September 1987, I volunteered information pertaining to my disposal activities at Walerko to the Elkhart County Health Department and provided a written statement concerning such activities. An accurate copy of that statement is attached as Exhibit 1.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 19, 1992.

  
Doug McDaniel



100 ELKHART ROAD  
GOSHEN, INDIANA 46526  
PHONE: (219) 534-1404

NOV 22 1988

STAN REEDY, M.D., M.P.H.  
HEALTH OFFICER

VOLUNTARY STATEMENT

DATE 9/14/87 TIME 4:15 P.M. PLACE WHERE TAKEN Health Dept.

IN REFERENCE TO Bad water

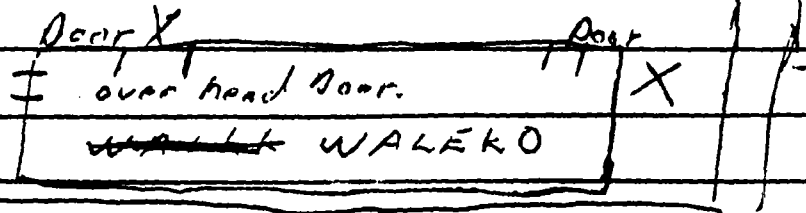
I, Doug McDaniel, am 30 years of age and my address is:  
1341 Carter St Elkhart IN

I have been advised that \_\_\_\_\_ is employed in the position of

\_\_\_\_\_ with the Elkhart County Health Department and have witnessed

his/her identification credentials. I now make the following statement freely:

I know that Tricklebush and  
cutting oils have been put into  
the ground by WALEKO Tool & Eng.  
X marks the spot <sup>where</sup> the waste was put into the  
in front of woods → X X Steel Bands ground.  
His colored soil → Alley



Cutting oils still leaking from Scrap  
bender last time I dumped ~~to~~ Soldents  
in the ground <sup>was</sup> about ~~once~~ two times  
in the 10 yrs about 5 to 8 years ago  
I know if on going

I have read page 1 of 1 and claim the facts contained therein are true and correct.

Signed Doug McDaniel Date 9/14/87 Ph # NO. 262-1977

Witnessed Stan Reedy Date 9/14/87

Exhibit 1.